

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 01**

**INTERNATIONAL BROTHERHOOD OF
TEAMSTERS, LOCAL 251**

and

**INTERNATIONAL BROTHERHOOD OF
TEAMSTERS, LOCAL 25**

and

DHL EXPRESS (USA), INC.

**Cases 01-CB-219768
 01-CC-219536
 01-CC-219746**

**GENERAL COUNSEL’S MOTION IN SUPPORT OF THE CHARGING PARTY’S
MOTION FOR SUMMARY JUDGMENT ON RESPONDENTS’ AFFIRMATIVE
DEFENSES**

Counsel for the General Counsel (the “General Counsel”) files this motion in support of the Charging Party’s Motion for Summary Judgment on Respondents’ Affirmative Defenses.¹ For the reasons set forth by the Charging Party, the General Counsel submits that each of Respondents’ affirmative defenses should be dismissed.

Respectfully submitted,

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¹ For purposes of this Motion, the General Counsel does not join in the Charging Party’s specific assertion that *Browning-Ferris Industries of California, Inc.*, 362 NLRB No. 186 (2015) was wrongly decided.

CERTIFICATE OF SERVICE

I hereby certify that I e-filed this document through the Agency's website and e-mailed a copy to Marc Gursky, Esq. at mgursky@rilaborlaw.com, Robert Fisher, Esq. at RFischer@seyfarth.com, and Michael Feinberg, Esq. at maf@fczlaw.com on the 30th day of July, 2018.

Respectfully submitted,

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